

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
MANHATTAN DIVISION

)
SECURITIES INVESTOR PROTECTION)
CORPORATION,)
)
Plaintiff-Applicant,)
) Adversary Proceeding No. 08-01789 (BRL)
v.)
) SIPA Liquidation
BERNARD L. MADOFF INVESTMENT)
SECURITIES, LLC,)
)
Defendant.)
)

)

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned appears as counsel for Iron Mountain Information Management, Inc., a creditor of the Debtor and whose address is 745 Atlantic Avenue, Boston, Massachusetts 02111 ("Iron Mountain") and, pursuant to Bankruptcy Rules 9010 and 2002, requests that all notices given or required to be given in this case and all papers served in this case be given to and served upon the undersigned at his office and address set forth below.

PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing request includes not only notices and papers referred to in the Rules specified above but also includes, without limitation, orders and notices of any applications, motions, petitions, pleadings, requests, complaints or demands: (1) which may directly, or indirectly, affect or seek to affect in any way any rights or interests of Iron Mountain with respect to (a) the Debtor; (b) property or proceeds thereof in which the Debtor may claim an interest; or claims or other property or proceeds thereof in the possession, custody or control of Iron Mountain; or (2) which require or seek to require any act, delivery of any property, payment or other conduct by Iron Mountain; or (3) which may otherwise affect the Debtor or property of the Debtor.

PLEASE TAKE FURTHER NOTICE that Iron Mountain intends that neither this Notice of Appearance, nor any former or later pleading, claim or suit shall waive (1) Iron Mountain's right to have final orders in non-core matters entered only after de novo review by a District Court Judge, (2) Iron Mountain's right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) Iron Mountain's right to have the

District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, set-offs, or recoupments to which Iron Mountain is or may be entitled under agreements, in law or in equity, all of which rights, claims, defenses, set-offs, and recoupments Iron Mountain expressly reserves.

Respectfully submitted,

Iron Mountain Information Management, Inc.
By its attorneys,

Dated: February 12, 2009

/s/ Frank F. McGinn

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